

**FOR THE DISTRICT OF DELAWARE**

Defendants.

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Civil Action No. 1:20-cv-01744-CFC

**[PROPOSED] ORDER**

“Motion to Compel”), as well as all submissions related thereto,

IT IS HEREBY ORDERED this \_\_\_\_ day of March, 2025, that:

3. Within 7 days of receiving the list of data fields produced by Walmart pursuant to Paragraph 2 of this Order, the parties shall exchange correspondence and meet-and-confer to

establish a complete universe of data fields for which Walmart will produce dispensing data responsive to Requests for Production Nos. 1 & 2 of the United States' First Set of Requests for Production.

4. If the parties agree to a complete universe of data fields for which Walmart will produce responsive records, Walmart shall produce, within 45 days of the date of this Order, all dispensing data responsive to Requests for Productions Nos. 1 & 2 of the United States' First Set of Request for Production, complete with all data fields agreed to by the parties.

5. If the parties cannot agree as to a complete universe of data fields for which Walmart will produce responsive records:

(a) Walmart shall produce, within 30 days of the date of this Order, all dispensing data responsive to Requests for Productions Nos. 1 & 2 of the United States' First Set of Request for Production, complete with all 72 data fields referenced in Parts I and II of Walmart's January 31, 2025, letter to counsel to the United States<sup>1</sup>; and

(b) the United States may request that this Court enter an order compelling Walmart to produce additional data fields for all dispensing data already produced by Walmart pursuant to this Paragraph 5.

\_\_\_\_\_  
THE HONORABLE ELEANOR G. TENNYSON  
UNITED STATES MAGISTRATE JUDGE

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<sup>1</sup> Walmart shall produce dispensing data pursuant to Paragraph 5(a) of this Order in a form that that allows for easy and seamless merging of such data with any additional data fields this Court orders Walmart to produce in response to a request by the United States pursuant to Paragraph 5(b) of this Order.